

William Bernarduci (WB 5785)  
SCHATZ & NOBEL, P.C.  
One Corporate Center  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Tel.: (860) 493-6292  
Fax: (860) 493-6290

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
LYDIA GARCIA, individually and on :  
behalf of all others similarly situated, :  
:  
Plaintiff, :  
:  
v. :  
:  
JAKKS PACIFIC, INC., JACK :  
FRIEDMAN, STEPHEN G. BERMAN, :  
and JOEL M. BENNETT, :  
:  
Defendants. :  
-----x

**Case No. 04-CV-8807-KMK**

**[PROPOSED] ORDER  
APPOINTING ALLAN SCHRAGER  
AS LEAD PLAINTIFF AND  
APPROVING SELECTION OF  
COUNSEL**

-----x  
QUANTUM EQUITIES L.L.C., individually:  
and on behalf of all others similarly  
situated, : **Case No. 04-CV-8877-KMK**  
:  
Plaintiff, :  
:  
v. :  
:  
JAKKS PACIFIC, INC., JACK :  
FRIEDMAN, STEPHEN G. BERMAN, :  
and JOEL M. BENNETT, :  
:  
Defendants. :  
-----x

-----x  
JAMES T. KAHN, individually and on :  
behalf of all others similarly situated, : **Case No. 04-CV-8910-KMK**  
:  
Plaintiff, :  
:  
v. :  
:  
JAKKS PACIFIC, INC., JACK :  
FRIEDMAN, STEPHEN G. BERMAN, :  
and JOEL M. BENNETT, :  
:  
Defendants. :  
-----x

-----x  
JONCO INVESTORS, LLC, individually :  
and on behalf of all others similarly :  
situated, :  
:  
:

**Case No. 04-CV-9021-KMK**

Plaintiff, :  
:  
:  
:

v. :  
:  
:  
:

JAKKS PACIFIC, INC., JACK :  
FRIEDMAN, STEPHEN G. BERMAN, :  
and JOEL M. BENNETT, :  
:  
:

Defendants. :  
:  
-----x

-----x  
JAMES IRVINE, individually and on :  
behalf of all others similarly situated, :  
:  
:  
:

**Case No. 04-CV-9078-KMK**

Plaintiff, :  
:  
:  
:

v. :  
:  
:  
:

JAKKS PACIFIC, INC., JACK :  
FRIEDMAN, STEPHEN G. BERMAN, :  
and JOEL M. BENNETT, :  
:  
:

Defendants. :  
:  
-----x

WHEREAS, by his January 4, 2005 Motion, proposed Lead Plaintiff Allan Schrager moved for his appointment as a “lead plaintiff” in the above Class Actions and for approval of Mr. Schrager ’s selection of Schatz & Nobel, P.C. as Lead Counsel;

WHEREAS, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), the Court finds that Mr. Schrager is the “most adequate plaintiff”;

NOW THEREFORE, based upon the Declaration of William Bernarduci, the exhibits thereto, and the memorandum of law in support of Mr. Schrager ’s Motion;

IT IS HEREBY ORDERED that

1. Mr. Schrager is appointed as Lead Plaintiff; and
2. Mr. Schrager’s selection of Schatz & Nobel, P.C. as Lead Counsel is

hereby approved.

DATED: \_\_\_\_\_, 2005

SO ORDERED:

---

HON. KENNETH M. KARAS